



U.S. Department  
of Transportation  
Research and  
Special Programs  
Administration

400 Seventh Street, S.W.  
Washington, D.C. 20590

April 17, 2001

Ref. No. A1-0001

Mr. Mark Connolly  
Mgr. Transportation Operations and Packaging  
Akzo Nobel Chemicals Inc  
300 South Riverside Plaza  
Chicago, IL 60606-6697

*Re: Recognition of Intermediate Bulk Container (IBC) Manufacturer, Owner or Third Party to Perform Periodic Testing and Inspections of UN specification IBCs*

Dear Mr. Connolly:

This is to clarify that the U.S. Hazardous Materials Regulations (HMR) in Title 49 of the U.S. Code of Federal Regulations (49 CFR) contain the standards for construction, testing and inspection of UN specification IBCs. As specified in 49 CFR 180.352, and consistent with the requirements of the UN Recommendations and the International Maritime Dangerous Goods Code (IMDG Code), the periodic inspection and testing of IBCs may be performed by the IBC manufacturer, owner, or a third party test laboratory registered with the U.S. DOT. The U.S. DOT does not specifically require third party periodic testing and inspection of IBCs.

The IBC owner or lessee must retain records of the periodic testing and inspections. Records must include the design types and packaging specifications, test and inspection dates, name and address of test and inspections facilities, names or name of any person conducting tests or inspections, tests or inspections specifics and results. The records must be kept for at least 2.5 years and made available upon request to a representative of the U.S. DOT.

Paragraph 6.5.1.6.4 of the 30th Amendment of the IMDG Code states that "... IBCs shall be inspected to the satisfaction of the competent authority". The U.S. DOT, as the U.S. competent authority, recognizes the periodic inspections and testing of IBCs performed by the IBC manufacturer, owner, or a third party test laboratory registered with the U.S. DOT.

Sincerely,

Frits Wybenga  
Deputy Associate Administrator  
for Hazardous Materials Safety



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